

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re</b>  <b>Fresh Acquisitions, LLC, <i>et al.</i><sup>1</sup></b>  <b>Debtors.</b>	<b>§ Chapter 11</b> <b>§</b> <b>§ Case No. 21-30721-SGJ-11</b> <b>§</b> <b>§ (Jointly Administered)</b>
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**SEGURA INVESTORS XII-XVI, LLC’S JOINDER IN THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS’ OBJECTION TO  
DEBTORS’ EXPEDITED MOTION TO EXTEND THE EXCLUSIVE PERIOD  
TO FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF**

Creditors Segura Investors XII-XVI, LLCs (“**Segura Investors**”) files this *Joinder* in the objection [Dkt. No. 350] (the “**Objection**”) filed by the Official Committee of Unsecured Creditors (the “**Committee**”) to the *Debtor’s Expedited Motion to Extend the Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof* [Dkt. No. 334] (the “**Motion**”)

WHEREFORE Segura Investors respectfully requests that the Court deny the relief sought in the Motion for all of the reasons stated in the Objection, and that this Court grant Segura Investors such other and further relief to which it may be justly entitled.

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<sup>1</sup>The Debtors in these chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number are as follows: Alamo Fresh Payroll, LLC (1590); Fresh Acquisitions, LLC (2795); Alamo Ovation, LLC (9002); Buffets LLC (2294); Hometown Buffet, Inc. (3002); Tahoe Joe’s Inc. (7129); OCB Restaurant Company, LLC (7607); OCB Purchasing, Co. (7610); Ryan’s Restaurant Group, LLC (7895); Fire Mountain Restaurants, LLC (8003); Food Management Partners, Inc. (7374); FMP SA Management Group, LLC (3031); FMP-Fresh Payroll, LLC (8962); FMP-Ovation Payroll, LLC (1728); and Alamo Buffets Payroll, LLC (0998). The Debtor’s principal offices are located at 2338 N. Loop 1604 W., Suite 350, San Antonio TX, 78248, United States.

DATED: August 16, 2021

Respectfully submitted

**EPHRON & BARENHOLTZ**

/s/ Brett Barenholtz

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*Counsel for Segura Investors XII-XVI, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 16, 2021, a true and correct copy of the above pleading was electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in these cases pursuant to the Electronic Filing Procedures in this District.

/s/ Brett Barenholtz

Brett Barenholtz